

# Dual/Multiple Citizenship

## Definition:

Dual/multiple citizenship enables a person to hold full membership – conveying rights, access, and obligations – in two or more countries. A person may have a claim to dual citizenship by any number of circumstances: they may inherit citizenship from one or more parents; obtain citizenship through jus soli (birth in a territory; for example, the United States recognizes all persons born in the country as citizens regardless of parental status); they may gain eligibility through ancestral claims (Israel, for example, allows any Jewish immigrant to claim citizenship without renouncing other nationalities); they may gain a new citizenship through the process of naturalization; or they may acquire it through other means (e.g. through marriage).

## Detailed Description:

Dual citizenship is often at the center of vigorous political debate, both internally among political parties and across borders between the conferring and sending states. On the one hand, allowing citizens to hold multiple passports provides increased mobility and enables expatriates to maintain connections with their country of birth or heritage. Dual citizenship can also facilitate integration by encouraging immigrants to naturalize and participate politically in their new country without compromising other connections. According to this view, compulsory renunciation of prior citizenship(s) may not only stymie migrants' personal integration but also generate a disincentive to citizenship acquisition altogether. On the other hand, critics of dual citizenship claim that it undercuts immigrant integration and that, in maintaining a second citizenship or identity, immigrants are never fully moored to their country of residence. Dual citizenship raises not only the specter of dual – and potentially divided – loyalty but it is also believed to create conflicts between states regarding an imbalanced distribution of the benefits and burdens of citizenship, as dual citizens could enjoy multiple rights and benefits (such as social benefits) or face multiple duties (such as military service) compared to mono-nationals. States also may take different positions on whether to allow dual citizenship for an immigrant naturalizing into the host society (as is the focus of this entry) compared to whether they allow expatriate citizens to maintain citizenship if they naturalize elsewhere. Politics are even further amplified when considering the implications not merely of dual nationality, but multiple citizenships.

Dual citizenship is widely accepted across many advanced democracies. Indeed, there has been a recent wave of change in the past couple of decades whereby more and more European states have begun to adopt dual citizenship laws for immigrants:[1] Italy abolished a requirement that immigrants naturalizing as Italians renounce a previous citizenship in 1992, and other countries that have recently removed renunciation requirements include Sweden (2001), Finland (2003) and, most recently, Luxembourg (2008). These states join other Western European countries as well as the post-colonial traditional countries of immigration (Australia, Canada, New Zealand, the United States[2]), which all tolerate dual citizenship. The following table identifies these states in the right-hand column as states that do not require renunciation as a condition for naturalization.[3] This table pertains to the rules of dual citizenship for naturalizing immigrants; policies for native-born citizens who naturalize abroad may differ.

### Renunciation of Prior Citizenship as a Requirement for Naturalisation

#### Renunciation Requirement

Yes	No
Post-Colonial	Australia Canada New Zealand United States
European Union	
Austria	Belgium

Bulgaria	Cyprus
Czech Republic	Finland (2003)
Denmark	France
Estonia	Greece
Germany*	Hungary
Latvia	Ireland
Lithuania	Italy (1992)
Netherlands**	Luxembourg (2008)
Poland***	Malta
Slovenia****	Portugal
Spain*****	Romania
	Slovakia
	Sweden (2001)
	UK
Non-EU	
Croatia	Iceland
Moldova (2002)	Switzerland
Norway	Turkey

\*Not for citizens of other EU member states (since 2007)

\*\* Not between 1992 and 1997. After 1997: exemption for persons born in the Netherlands and for spouses of Dutch citizens

\*\*\* In practice, renunciation is requested discretionarily and performed in low numbers

\*\*\*\*Not for citizens of other EU member states where there is reciprocity

\*\*\*\*\* In practice, no evidence of renunciation is required.

This table also illustrates two additional patterns of interest. First, there remain a number of significant hold-outs to the liberalizing trend of tolerating multiple citizenships. Austria and Denmark, as well as a majority of recent-European Union accession countries, have firm requirements for renunciation. In the Netherlands, after a period of allowing dual citizenship (1992-1997), dual citizenship can now only be claimed by those applicants born in the Netherlands or by spouses married to Dutch citizens.

The second trend this table indicates is that while a number of states maintain a renunciation requirement de jure, practices produce a de facto toleration of multiple citizenships. The many asterisks that appear next to country names in the left-hand column indicate some of these exceptions to the rule. Effective enforcement of renunciation exists in countries like Austria, the Czech Republic, Denmark, Estonia, Germany (with the exception of citizens of other EU member states), and the Netherlands (except for persons born in the Netherlands and spouses of Dutch citizens). In Spain, however, while persons granted citizenship need to declare renunciation of a prior citizenship, they do not need to deliver any proof that they have actually lost another citizenship and no request for information or for evidence is sent to the country of the presumptively renounced citizenship. In Poland, persons granted citizenship are formally required to renounce a previous citizenship, but this is applied in a discretionary manner and, as a result, a high percentage of persons become dual citizens through naturalization. There are also exceptions practiced when renunciation is deemed unreasonable. The extent to which exceptions are granted in countries like Austria, Denmark, Germany, and the Netherlands, for example, is based on the fee that candidates need to pay in their country of origin to be released from their previous citizenship, which varies from country to country. As a rule, renunciation is normally not required when this is not possible (as is the case, for example, for citizens from most Arab countries). Also, for reasons of practical impossibility or unreasonable burdens, a number of countries make explicit exceptions to the renunciation requirement for refugees.

Why do some states allow for dual citizenship while others do not? In some cases, countries have different historical interpretations of citizenship, which have lead to particular bureaucratic practices and political debates in a path-dependent way.[4] Greece, Italy and Hungary are often seen as more restrictive countries of immigration, but they have relatively liberal dual citizenship practices because they are historic nations of emigration. Sometimes the politics

of dual citizenship hinges on the composition and political strength of immigrant populations within the country or co-ethnic communities living abroad. Thus, in the cases of Hungary, Greece, and Italy, dual citizenship is a strategy for keeping expatriates and co-ethnics living abroad connected to homeland identity. Spain is an exception to this rule, but allows for an easier, facilitated naturalization among co-ethnics from Spanish-speaking countries. Other countries that tolerate dual citizenship do so as an instrument for promoting immigrant integration within traditionally inclusive conceptions of citizenship, such as in Belgium, France, and the UK.

Beyond the question of whether or not states allow for immigrants to obtain dual citizenship, a second question is whether immigrants decide to take up multiple citizenships. Laws might make or allow people to hold multiple citizenships due to birth, heritage, marriage or naturalization, but not everyone knows that they have the legal ability to hold dual citizenship or identify unique incentives for seeking out multiple passports. A study of naturalized immigrants in Canada in the 1990s showed that while reports of dual citizenship had tripled from 1981 to 1996, only 17% reported multiple nationality.[5] Immigrants born in countries that allowed multiple citizenship and who were naturalized Canadian citizens were, in the eyes of the law, dual citizens, but in every case but Switzerland, less than half of immigrants acknowledged their dual citizenship status.

This brief overview of dual citizenship policies reveals patterns of both convergence toward toleration and continued divergence with regard to requiring renunciation of prior citizenship by certain group or by all outsiders. Though many states that require renunciation by law do not adhere to this stricture, a number of European states continue to limit dual citizenship. The salience of the politics of dual citizenship only reaffirms the continued relevance of political belonging and national membership through citizenship in an age of migration, mobility, and diversity.

#### Footnotes

[1]Thomas Faist, *Dual citizenship in Europe: From nationhood to societal integration* (Ashgate Publishing, Ltd., 2007); Tanja Brøndsted Sejersen, "'I Vow to Thee My Countries'—The Expansion of Dual Citizenship in the 21st Century," *International migration review* 42, no. 3 (2008).

[2]While the United States maintains allowance for multiple citizenship de facto, naturalizing citizens formally swear to "absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state or sovereignty, of whom or which I have heretofore been a subject or citizen" during the Naturalization Oath of Allegiance.

[3]For a full discussion, and where this table originally appears, see Sara Wallace Goodman, "Naturalisation Policies in Europe: Exploring Patterns of Inclusion and Exclusion," in *EUDO Citizenship Comparative Reports* (Florence: EUDO Citizenship, Robert Schuman Centre for Advanced Studies, EUI, 2010)

[4]Thomas Faist, Jürgen Gerdes, and Beate Rieple, "Dual Citizenship as a Path-Dependent Process," *International Migration Review* 38, no. 3 (2004); Marc Morjé Howard, *The Politics of Citizenship in Europe* (Cambridge: Cambridge University Press, 2009)

[5]Irene Bloemraad, "Who Claims Dual Citizenship? The Limits of Postnationalism, the Possibilities of Transnationalism, and the Persistence of Traditional Citizenship," *International Migration Review* 38, no. 2 (2004): 405.

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